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County of San Diego
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Attorneys for Defendants County of San Diego, Ian Baxter, Alfredo Guardado, Brooke Guild, Benita Jemison, Abigail Joseph, Nancy Quinteros, and Antonia Torres

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

MICHAEL LEWIS, LAUREN TAYLOR,)
and minors CAMERAN LEWIS and)
BAILEY LEWIS, by and through their)
Guardian ad Litem,)

Plaintiffs,

v.

COUNTY OF SAN DIEGO; CITY OF)
CORONADO; CORONADO POLICE)
OFFICER PATRICK O'MALLEY;)
CORONADO POLICE OFFICER)
ROBERT CLINE; COUNTY AGENT)
IAN BAXTER; COUNTY AGENT N.)
QUINTEROS; COUNTY AGENT)
SUPERVISOR BENITA JEMISON;)
COUNTY AGENT ABIGAIL JOSEPH;)
COUNTY AGENT SUPERVISOR)
ANTONIA TORRES; COUNTY AGENT)
BROOKE GUILD; COUNTY AGENT)
SUPERVISOR ALFREDO GUARDADO;)
and DOES 1-50,)

Defendants.

No. '13CV2818 L JMA

**NOTICE OF REMOVAL OF CIVIL
ACTION**

[28 U.S.C. §§ 1343, 1441]

**TO THE CLERK OF THE ABOVE-ENTITLED COURT AND ALL PARTIES
AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Defendants County of San Diego, Ian Baxter,
Nancy Quinteros, Benita Jemison, Abigail Joseph, Antonia Torres, Brooke Guild, and

1 Alfredo Guardado (“Defendants”) hereby remove to the United States District Court for
2 the Southern District of California a civil action entitled *Michael Lewis, et al. v. County*
3 *of San Diego, et al.*, Case No. 37-2013-00061742-CU-PA-CTL (the “State Action”),
4 which was originally filed in Superior Court of the State of California, County of San
5 Diego, Central Branch on August 7, 2013.

6 On October 30, 2013, Defendant County of San Diego was served with the
7 Summons and Complaint, and on November 4, 2013, Ian Baxter, Alfredo Guardado,
8 Brooke Guild, Benita Jemison, Abigail Joseph, Nancy Quinteros, and Antonia Torres
9 were served with the Summons and Complaint, a copy of which is attached as Exhibit A.

10 This action is a civil action of which this Court has original jurisdiction under 28
11 U.S.C. §§ 1331 and 1343, and is one which may be removed to this Court by Defendants
12 pursuant to 28 U.S.C. § 1441 based on allegations in the State Action that it arises under
13 the U.S. Constitution and the laws of the United States, specifically 42 U.S.C. § 1983.

14 Defendants City of Coronado, Coronado Police Officer Patrick O’Malley, and
15 Coronado Police Officer Robert Cline have been served with the Summons and
16 Complaint, and join in this notice of removal.

17 DATED: November 27, 2013 THOMAS E. MONTGOMERY, County Counsel

18 By: s:/ David L. Brodie
19 DAVID L. BRODIE, Senior Deputy
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